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12 UNITED STATES DISTRICT COURT
13 EASTERN DISTRICT OF CALIFORNIA

14 JENNIFER WEAVER,

15 Plaintiff,

16 v.

17 MARTIN O'MALLEY,
18 Commissioner of Social Security,

19 Defendant.

No. 2:24-cv-01957-CKD

STIPULATED MOTION AND ORDER FOR
AN EXTENSION OF TIME TO RESPOND TO
PLAINTIFF'S MOTION FOR SUMMARY
JUDGMENT

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21 IT IS HEREBY STIPULATED, by and between the parties through their respective
22 counsel of record, with the Court's approval, that Defendant's time for responding to Plaintiff's
23 Motion for Summary Judgment be extended thirty (30) days from December 4, 2024, to January
24 3, 2025. This is Defendant's first request for an extension. Counsel for Plaintiff has no objection
25 to Defendant's request for an extension.

26 Good cause exists for this request. Defendant respectfully requests this additional time
27 because Counsel for Defendant has and will be unable to devote the time required to complete its
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1 response. Counsel has multiple merit briefs currently due in district court cases within the next
2 week. Counsel for Defendant will also be out of the office on November 26-29, 2024. Given
3 competing workload requirements an extension until January 3, 2025 will provide the opportunity
4 for the undersigned Counsel for Defendant to prioritize completing the response to Plaintiff's
5 Motion for Summary Judgment. The undersigned Counsel apologizes to the Court and Plaintiff's
6 counsel for any inconvenience caused by this request and delay. All other dates in the Court's
7 Scheduling Order shall be extended accordingly.

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9 Respectfully submitted,

10 PHILLIP A. TALBERT
11 United States Attorney

12 DATE: December 2, 2024

13 By: s/ Oscar Gonzalez de Llano
14 OSCAR GONZALEZ DE LLANO
15 Special Assistant United States Attorney
16 Attorneys for Defendant

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18 Respectfully submitted,

19 DATE: December 2, 2024

20 By: s/ Kyle Kitson *
21 KYLE KITSON
22 HOMELESS ACTION CENTER
23 (*as authorized by email)
24 Attorney for Plaintiff
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ORDER

Pursuant to the above stipulation, defendant's Motion for Extension of Time (ECF No. 14) is GRANTED. Defendant shall have an extension, up to and including January 3, 2024, to respond to Plaintiff's Motion for Summary Judgment. SO ORDERED.

Dated: December 4, 2024



CAROLYN K. DELANEY
UNITED STATES MAGISTRATE JUDGE